



March 26, 2003

Richard H. Karney, P.E., Manager
ENERGY STAR Program
U.S. Department of Energy
1000 Independence Ave.
Washington, D.C. 20585

Re: ENERGY STAR Windows Criteria Update

Mr. Karney:

On behalf of the Associated Builders and Contractors (ABC), I respectfully submit these comments on the proposed criteria for awarding the Energy Star to home replacement windows.

ABC represents more than 23,000 merit shop contractors, subcontractors, material suppliers and construction-related firms in 80 chapters across the United States. The vast majority of these members are small businesses with 10 employees or less. ABC believes that adoption of the four-zone temperature map will protect the interests of all parties involved in both hard coat and soft coat window production, including manufacturers, suppliers, and distributors. Furthermore, we believe that it is the better choice for the country, as it will provide more savings in energy consumption and consumer costs.

DOE analysis shows the four-zone alternative as the best in terms of overall energy efficiency for our nation and lower energy costs for individual consumers. Data shows that the four-zone map option saves 16% more total energy for our country than the three-zone version. Also, studies predict that annual energy cost savings per household under the four-zone alternative would be \$30.19 while the savings under the three-zone alternative would be \$28.32.

In closing, we believe that, based on the information discussed above, the four-zone option is the better choice. This option will save energy, save money, and will not decrease industry competition.

Thank you for the opportunity to comment.

Sincerely,

Michael Pearlstein
Manager, Regulatory Affairs